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May 15, 2020

5-18-2020
The time to respond is
extended to June
22,2020. SO
ORDERED.

VIA ECF

Honorable Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007



**Re: Tiffany Gaines v. The City of New York, et al.,
20 CV 2980 (PAC)**

Your Honor:

I represent the Plaintiff. I write to respectfully request a six-week extension of time to respond to Defendant City of New York's ("City") pre-motion conference letter in anticipation of their partial motion to dismiss some of Plaintiff's claims, from the current deadline of May 18, 2020, up to and including June 22, 2020. This is the first such request for an extension of time, and the Defendant City consents to this request. The reason for this request is because I gave birth to my first child on May 9, 2020 (six days ago) and I am a solo practitioner. As such, in the coming few weeks, I will not be able to work at my usual full capacity.

Separately, I also note that I am in the process of attempting continued efforts to serve Defendants Brandon Lee, C.O. Washington, C.O. Kitt, Captain Newland, Dr. Roach, and HHC. My process server attempted to serve Defendants C.O. Washington, C.O. Kitt, Captain Newland, Dr. Roach, and HHC at the addresses listed on their respective summonses. When he attempted to serve HHC, he was informed that HHC headquarters had moved in light of COVID. When the process server went to Rikers to serve C.O. Washington, C.O. Kitt, Captain Newland, and Dr. Roach, a Rikers employee informed the process server that the complete names of the Defendants and the exact addresses of the buildings they work at on Rikers are required in order to serve them. Plaintiff does not currently have this information. I have conferred with counsel for the Defendant City, Angharad Wilson, and she has agreed to "work on obtaining the service addresses for the individual defendants" and will provide them to me once she has obtained them. I thank the Court for its time and consideration.

Respectfully submitted,
/s/
Jessica Massimi, Esq.